

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|---|---|--------------------------|
| PELLEGRINO FOOD PRODUCTS, INC. |) | |
| Plaintiff, |) | Case No. : 1:05-CV-00189 |
| |) | |
| v |) | |
| |) | |
| RHEON U.S.A. |) | |
| Defendant/Counterclaim |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| PELLEGRINO FOOD PRODUCTS |) | |
| COMPANY, INC., also known as PELLEGRINO |) | |
| FOOD PRODUCTS, INC., |) | |
| |) | |
| Counterclaim Defendant, |) | |
| |) | |
| and |) | |
| |) | |
| CALIFORNIA FIRST LEASING CORPORATION |) | |
| |) | |
| Counterclaim Defendant. |) | |

AFFIDAVIT OF GARY SEIFFER

I, Gary Seiffer, hereby aver as follows:

1. My name is Gary Seiffer.
2. I am currently a Regional Sales Manager for Rhcon U.S.A ("Rhcon") and work out of a sales office located at 35 Edgewood Road in Monroe, Connecticut.

3. I am aware of the events at issue in this litigation as I was Rheon's principal contact with the Plaintiff, Pellegrino Food Products, Inc., which is based in Warren, Pennsylvania.


4. As a result, if a trial occurs in this case, I would anticipate serving as a central witness for Rheon.

5. As I am based out of Connecticut, should a trial occur, it would be considerably more convenient for me to serve as a witness if the trial took place in Pennsylvania as opposed to California, given Pennsylvania's relative geographic proximity to Connecticut as compared with California.

6. I aver that the foregoing statements are true and correct to the best of my knowledge, information, and belief.


Gary Seiffer

Sworn to and subscribed
before me this 7th
day of November, 2005


Notary

MARSHA A. MOTTER
NOTARY PUBLIC
My Commission Expires April 30, 2010